

Amendments to the Drawings:

The attached sheets of drawings includes changes to figures 1-3 and 5. These sheets which include figures 1-5, replace the original sheets including figures 1-5.

Attachment: Replacement Sheets

REMARKS

This Response is submitted in reply to the Office Action dated December 26, 2007. Claims 1-19 are currently pending. Claims 1 and 17 are in independent form. Claims 1-17 are hereby amended. Claim 19 is hereby canceled. Please charge Deposit Account No. 02-1818 for all payments due in connection with this Response.

Drawings

The Office Action stated new corrected drawings are required because the drawings lack the description of what each of the boxes represent. Applicant has submitted new replacement drawings, and respectfully submits such drawings overcome the Office Action's statement.

Claim Rejections

The Office Action rejected:

- 1) claims 1 and 17-19 under 35 U.S.C. 102(b) as being anticipated by U.S. Patent Publication No. 2002/0186653 to Jensen ("Jensen");
- 2) claims 2-7 and 16 under 35 U.S.C. 103(a) as being unpatentable over Jensen in view of U.S. Patent Publication No. 2002/0167898 to Thang ("Thang");
- 3) claim 8 under 35 U.S.C. 103(a) as being unpatentable over Jensen in view of U.S. Patent Publication No. 2002/0131362 to Callon ("Callon");
- 4) claims 9-11 under U.S.C. 103(a) as being unpatentable over Jensen in view of Thang and further in view of Callon; and
- 5) claim 12 under 35 U.S.C. 103(a) as being unpatentable over Jensen in view of U.S. Patent Publication No. 2003/0023893 to Lee ("Lee");
- 6) claims 13-14 under 35 U.S.C. 103(a) as being unpatentable over Jensen in view of Thang and in further view of Lee; and

- 7) claim 15 under 35 U.S.C. 103(a) as being unpatentable over Jensen in view of Thang and U.S. Patent Publication No. 2005/0100025 to Nagami ("Nagami").

In light of the claim amendments made herein, Applicant respectfully disagrees with, and traverses, such rejections.

1. The rejection of independent claims 1 and 17, and dependent claims 18-19 under 35 U.S.C. 102(b) as being anticipated by Jensen.

Jensen discloses a substitution of virtual router redundancy protocol ("VRRP") by a completely new network redundancy mechanism. (Jensen, Specification, Abstract, ¶¶ 7 and ¶¶ 9). The VRRP in Jensen is replaced because it is "difficult and expensive to set up" and "each additional VRRP router may add to the overall system cost and administration requirements." (Jensen, ¶¶ 9). The complete status of the active router in Jensen is mirrored to a standby-router. The standby-router has to detect the failure and act accordingly. For example, Jensen discloses:

[0018] In one embodiment of the invention, program partition 212 contains program instructions that will be collectively referred to herein as **a mirroring module. This module may perform the functions for both the active router and the standby router**, to ensure that the standby router may monitor for failure of the active router, and take over the functions of the active router if the active router fails. (emphasis added).

Additionally, the stand-by router in Jensen mirrors the routing in the network and makes its decision by evaluating routing tables and routing information. For example, Jensen discloses:

[0029] Once router 108 has determined that router 106 has failed, router 108 **may take over operations** for router 106. Since router 108 has been periodically receiving routing information for router 106, **the routing table of router 108 should have substantially the same routing information** as the routing table for router 106. (emphasis added).

[0030] Once router 104 has **changed its routing table to reflect that information for router 106** is to be sent to router 108, router 108 may **take over the operations** of router 106 and will now act as the new active router for system 100. Router 108 will receive information from router 104 and route to switch 110

to replace the failed path containing router 106. (emphasis added).

Amended independent claim 1 recites, among other elements, "configuring the master router to: (a) monitor the criteria; and (b) trigger switching between the master router and the back up router based on the criteria."

Amended independent claim 17 recites, among other elements, "a criteria that relates a condition of the network to the virtual router redundancy protocol, the master router configured to monitor the criteria thereby causing the master router to trigger switching between the master router and the back up router to route the telecommunications traffic according to the condition in the network."

Jenson does not disclose the master router configured to monitor the criteria and trigger switching between the master router and the back up router based on the criteria. In claims 1 and 17, the master router monitors criteria, while the result of the monitoring changes the VRRP behavior. The master router acts if a condition is detected on the master router side. The back up router does not know anything about these conditions on the master router side. In Jenson, the complete status of the active router is mirrored to the standby-router. Thus, it is the standby-router in Jensen that detects the failure and acts accordingly.

Moreover, the active router in Jensen cannot trigger switching between the master router and the back up router. Jenson mirrors the status of the master to the standby router. In claims 1 and 17, the master router triggers switching between the master router and the back up router based on the criteria. Thus, the back up router works even if no routing information is available, which is the case, if the core network is operated with static routing. The criteria is configured to enable local configuration of specific events or situations as a trigger for the switching of the VRRP. For example, the master router may be configured to trigger switching based on a specific data packet detected on the links of the master router.

For at least the foregoing reasons, Applicant submits that independent claims 1 and 17, and the claims that depend therefrom, are patentable over Jensen and in condition for allowance.

2. The rejection of claims 2-7 and 16 under 35 U.S.C. 103(a) as being unpatentable over Jensen in view of Thang.

Dependent claims 2-7 and 16 depend from independent claim 1. Such rejected claims are patently distinguished over the prior art for reasons similar to those submitted with respect to independent claim 1.

3. The rejection of claim 8 under 35 U.S.C. 103(a) as being unpatentable over Jensen in view of Callon.

Dependent claim 8 depends from independent claim 1. Such rejected claim is patently distinguished over the prior art for reasons similar to those submitted with respect to independent claim 1.

4. The rejection of claims 9-11 under U.S.C. 103(a) as being unpatentable over Jensen in view of Thang and further in view of Callon.

Dependent claims 9-11 depend from independent claim 1. Such rejected claims are patently distinguished over the prior art for reasons similar to those submitted with respect to independent claim 1.

5. The rejection of claim 12 under 35 U.S.C. 103(a) as being unpatentable over Jensen in view of to Lee.

Dependent claim 12 depends from independent claim 1. Such rejected claim is patently distinguished over the prior art for reasons similar to those submitted with respect to independent claim 1.

6. The rejection of claims 13-14 under 35 U.S.C. 103(a) as being unpatentable over Jensen in view of Thang and in further view of Lee.

Dependent claims 13-14 depend from independent claim 1. Such rejected claims are patently distinguished over the prior art for reasons similar to those submitted with respect to independent claim 1.


7. The rejection of claim 15 under 35 U.S.C. 103(a) as being unpatentable over Jensen in view of Thang and Nagami.

Dependent claim 15 depends from independent claim 1. Such rejected claim is patently distinguished over the prior art for reasons similar to those submitted with respect to independent claim 1.

An earnest endeavor has been made to place this application in condition for allowance, and such allowance is courteously solicited. If the Examiner has any questions related to this Response, Applicant respectfully requests that the Examiner contact the undersigned.

Respectfully submitted,

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